

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

**UNITED STATES OF AMERICA
PLAINTIFF.**

v.

**DEMARIO CAMPBELL,
KEITH HALL, JOSEPH LOONEY,
JEAN PIERRE AURRUE, and
RYAN SARAVIA,
DEFENDANTS.**

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CR. NO. 3:05cr207-T

JOINT MOTION TO CONTINUE

Comes now Defendant, DeMario Campbell, by and through counsel of record, Timothy Halstrom, and joined by: Jeffery C. Duffey, Attorney for Defendant, Keith Hall; Joseph Peter Van Heest, Attorney for Defendant, Joseph Looney; Jennifer Anne Hart, Attorney for Defendant, Jean Pierre Arrue; and Ben E. Bruner, Attorney for Defendant, Ryan Saravia, and move the Court to continue the trial of this cause presently set for the trial term commencing April 24, 2006 and in support thereof state as follows:

1. During the Court's pre-trial hearing of April 3, 2006, an agreement of all parties to this cause was reached that a continuance would be in the best interest of justice and in the interest of judicial economy.

2. It is the considered opinion of counsel that this case will be resolved without the necessity of trial, however, due to the extraordinary circumstances surrounding the fact that four of the five defendants reside in the State of California, and the fifth in Jacksonville, Florida, counsel for Defendants and the Counsel for the Government have not been able to coordinate necessary proceedings prior to notifying the court of their intent to Change Plea.

3. Counsel for some of the Defendants have arranged to meet with agents of the Government to tender proffers in the very near future. Others are scheduled to meet with their clients within the next two weeks prior to scheduling a “proffer” meeting. The Defendants have had to arrange flight schedules to arrive in time to conduct the business necessary. In the case of at least two of the Defendants (Demario Campbell and Keith Hall), it will not be possible to complete the proffers in time for the Government to prepare agreements necessary to complete the process whereby Counsel can file a Notice of Intent to Change Plea.

4. Each of the Defendants is currently on bond pending trial or other resolution to his case and none will be prejudiced by the Court granting this Motion to Continue.

5. The Government is in agreement that a continuance will facilitate an orderly disposition of this case.

6. Attorneys for Defendants will file Speedy Trial Waivers separately as soon as they can be received from each individual client.

Wherefore, the above matters considered, the parties hereto jointly pray this Court grant this Motion to Continue and place this case on the docket of the Court’s August 7, 2006 trial term which appears to be the Court’s next scheduled trial term.

Respectfully submitted this day, April 6, 2006.

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CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2006, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all parties.

/s/Timothy C. Halstrom
Timothy C. Halstrom
Bar Number HAL021